

**UNITED STATES DISTRICT COURT  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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<b>CLIFFS MINING COMPANY</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 2:18-cv-00581-WED</b>
	)	
<b>v.</b>	)	<b>Magistrate Judge Duffin</b>
	)	
<b>WISCONSIN ELECTRIC</b>	)	
<b>POWER COMPANY and</b>	)	
<b>WISCONSIN GAS LLC,</b>	)	
	)	
<b>Defendants.</b>	)	

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**JOINT MOTION TO TEMPORARILY STAY CASE**

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Plaintiff Cliffs Mining Company and Defendants Wisconsin Electric Power Company and Wisconsin Gas LLC submit this joint motion for a temporary stay, and state as follows:

1. As this Court is aware, this case involves an agreement regarding the process to remediate the former Solvay Coke and Gas Company site in Milwaukee, Wisconsin (the "Site"). The EPA has recently issued a report containing proposed remedies for the Uplands portion of the Site for public comment.

2. As a result of the remedies recommended by the report approved by EPA, the parties believe that a stay of this case is prudent so that they may further discuss a resolution of this litigation. The parties believe that continued litigation at this point will hinder the parties' ability to resolve this case.

3. The parties request of stay of all discovery and due dates through and including May 15, 2019. At the conclusion of this period, the parties are optimistic that they will be able to submit a proposed order to resolve this litigation. If not, the parties will submit a schedule to the Court requesting a modification of the Scheduling Order.

WHEREFORE, Plaintiff and Defendants request that the Court grant this motion and stay this litigation through and including May 15, 2019, with the parties to submit either a proposed order resolving this case or a proposal to amend the scheduling order by May 24, 2019.

DATED: January 29, 2019

Respectfully submitted,

SEYFARTH SHAW LLP

By: s/ Louis S. Chronowski

Louis S. Chronowski

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Plaintiff CLIFFS MINING COMPANY

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Dated: January 29, 2019

Respectfully submitted,

WISCONSIN ELECTRIC POWER  
COMPANY  
and WISCONSIN GAS LLC

By: s/ Joseph A. Cancila

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### **CERTIFICATE OF SERVICE**

The undersigned attorney certifies that a copy of this document was served on all counsel of record via the Court's ECF system on this 29th day of January 2019.

s/ Louis S. Chronowski

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Louis S. Chronowski